

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALPER KOLCU,

Plaintiff,

v.

Case No. 22-CV-1552

SHERIFF DENITA R. BALL,

Defendant.

**DEFENDANT’S CIVIL L.R. 7(h) EXPEDITED
NON-DISPOSITIVE MOTION TO EXTEND DEADLINE TO FILE
HER RESPONSE TO PLAINTIFF’S PENDING MOTIONS**

Defendant, Sheriff Denita R. Ball, through her attorneys, the Milwaukee County Office of Corporation Counsel, by Acting Corporation Counsel Scott F. Brown, hereby moves the Court, pursuant to Civil L.R. 7(h), and Fed. R. Civ. P. 16(b) and 6(b)(1)(A), for good cause shown, for an order extending the time by which Defendant may file her opposition to Plaintiff’s Motion to Compel Discovery Responses and Motion for Discovery Sanctions (ECF Nos. 28, 31).

As grounds for this motion, the undersigned states as follows:

1. On May 22 and May 23, 2024, Plaintiff filed with the Court motions to compel discovery and for sanctions against Sheriff Ball, respectively. (ECF Nos. 28, 31)
2. Because Plaintiff filed both motions under this Court’s expedited motion practice local rule, Sheriff Ball’s memoranda in opposition must be filed on or before May 29 and May 30, 2024. *See* Civ. L.R. 7(h)(2) (E.D. Wis.).
3. At the request of a party, the Court has the discretion to extend the time by which an act may be done for good cause shown. *See* Fed. R. Civ. P. 6(b)(1)(A) (“When an act

may or must be done within a specified time, the court may, for good cause, extend the time... if a request is made, before the original time or its extension expires.”)

4. Counsel for the Defendant, Karen L. Tidwall, is out of town with limited access to email from May 20 until June 3, 2024. Given Plaintiff’s litigious history and the pending telephone conference in this matter, the undersigned believes Deputy Karen Tidwall is in the best position to determine whether memoranda opposing Plaintiff’s motions are required or if Sheriff Ball would be better served seeking sanctions against Plaintiff.
5. This motion is not being filed for purposes of delay or harassment but rather to ensure that defense counsel has sufficient time to adequately review and prepare for next steps, whether that be to prepare oppositional memoranda or another avenue.
6. Therefore, the undersigned respectfully requests that the deadline by which Sheriff Ball shall file her response to Plaintiff’s Motion to Compel Discovery Responses and Motion for Discovery Sanctions be extended to Monday, June 10, 2024.

For the foregoing reasons, Defendant Sheriff Ball respectfully requests that the Court grant this motion to extend the opposition deadlines to June 10, 2024.

Dated at Milwaukee, Wisconsin this 29th day of May, 2024.

By: s/ Scott F. Brown
SCOTT F. BROWN
Acting Corporation Counsel
State Bar No. 1089753

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